

### Claim 1

*Apparatus for cleaning water,*

Independent apparatus (product) claim, defines the field of the invention as equipment which is suitable for removing entrained detritus and particles from water

Because “for” means suitable for by patent drafting convention; cleaning includes removing large detritus (e.g. leaves and moss) and smaller particles [page 5, lines 3-4 and 12-13]

*the apparatus comprising*

the apparatus includes, but is not limited to, the features that follow because this is the conventional usage in patent specifications

*a holding tank with a central aperture*

holding tank = a vessel in which water is retained for a period of time

because the purpose of the holding tank is to retain water for a period of time while small particles settle out [page 5, lines 6 – 13].

Central aperture = a hole which is located approximately in the centre of the holding tank;

Because page 6, lines 27 – 30 explains that the hole does not need to be exactly central; nonetheless, the word “central” must have some limiting effect.

*through which extends an upstanding pipe,*

“which” refers to the aperture rather than the holding tank because this is apparent from Figs 1 & 2

extends = the pipe runs from below the aperture to above the aperture because this is set out on page 4, lines 19-20

upstanding = generally vertical because the skilled person would understand that being exactly vertical is not essential

pipe = a tube because this is stated on page 4, line 19

*the uppermost edge of which providing a weir,*

Uppermost edge = top end (normal meaning); “which” must refer to the tube; because it cannot refer to the aperture, or the holding tank, because the upper edges of these can’t provide a weir

weir = a low dam which regulates the level and flow of water because the purpose of the weir is to retain water temporarily to allow particles to settle out (see page 5, lines 6 – 8)

*the holding tank having a filter material provided across its top.*

Filter material = something which removes entrained detritus, e.g. a mesh because this is the purpose of the filter material (see page 5, lines 2 – 4 and 6)

Across its top: the filter must extend at least across the flow path of the water into the holding tank above the weir because the purpose of the filter is to remove entrained particles.

However, it is not necessary for this purpose for the filter to cover the whole of the upper surface of the holding tank, nor for it to be situated exactly at the top and because Figure 1 shows the mesh (23) = the filter located just below the upper edge of the holding tank (15)

## Claim 2

*Water cleaning and storage apparatus, the apparatus comprising*

Separate independent claim apparatus claim;

equipment which is suitable for removing entrained detritus and particles from water and also for holding the water that has been cleaned until it is used

Because “for” means suitable for by patent drafting convention; cleaning includes removing large detritus (e.g. leaves and moss) and smaller particles [page 5, lines 3-4 and 12-13]; the water that has been is then held in the equipment until used [page 6, lines 7 – 10]

comprising has meaning set out for claim 1

*a water storage tank having a top wall through which a pipe extends,*

water storage tank means a vessel for holding the cleaned water until it is used

because this is the purpose of the storage tank, as set out at page 5, lines 18 – 21

top wall means the upper surface of the storage tank

because this is set out at page 6, lines 7 – 10 and is the structure shown in Figure 2 (labelled 103)

a pipe = a tube because this is shown in Figure 2

“which” refers to the top wall rather than the storage tank because this is apparent from Figure 2

extends = the tube runs from below the top wall, though it, to above the top wall because this is set out on page 4, lines 19-20

*one end of the pipe providing a weir,*

“one end of the pipe” means the upper part of the pipe above the top wall because the lower end of the pipe cannot fulfil this purpose; and the upper edge on its own cannot serve the purpose of providing a weir. The description uses the word “weir 106” to refer to the pipe, rather than the upper edge (see page 5, lines 26 – 28).

weir = a low dam which regulates the level and flow of water because the purpose of the weir is to retain water temporarily in a water settling volume to allow particles to settle out (see page 5, lines 26 – 28 and 33 - 34);

*a peripheral wall upstands from the storage tank to provide a holding tank*

peripheral = outermost because this is its normal meaning

upstands from the storage tank to provide a holding tank means that the peripheral wall extends above the top wall of the storage tank so that the top wall and the peripheral wall together form a vessel for temporarily retaining water while particles settle out because this is set out on page 5, lines 19-20 and 33-34, and is shown in Figure 2 as wall extension 104

*and wherein a filter material is secured over and between the peripheral wall.*

Filter material = something which removes entrained detritus, e.g. a mesh because this is the purpose of the filter material (see page 5, lines 2 – 4 and 6)

Secured over and between the peripheral wall means attached to the peripheral and located above its upper edge and extending across the top of the holding tank because this is shown in Figure 2 and set out on page 5, line 23

### **Claim 3**

*Apparatus according to Claim 1 or 2, comprising*

Apparatus which has all of the features of claim 1 or claim 2 plus those that follow (comprising = includes but not limited to, as set out for claim 1)

[when dependent on claim 1] *a wall sloping from or to the pipe.*

Wall sloping to or from the pipe = the bottom surface of the holding tank which is inclined to the horizontal, either towards or away from the pipe because this is shown in Figure 1 (base 11, see page 4, line 18) and Figure 2 (top wall 103, see page 5, lines 19-20)

[when dependent on claim 2] *a wall sloping from or to the pipe.*

“a wall” - claim 2 already refers to two walls: the top wall and the peripheral wall; the term “wall” in claim 3 must refer to the top wall, because Figure 2 shows that this is inclined towards or away from the weir 106 (depending on whether the weir is up or down), whereas the peripheral wall is shown as vertical, not sloping).

sloping to or from the pipe = the top wall of the storage tank is inclined to the horizontal either towards or away from the pipe because this is shown in Figure 2 (top wall 103, see page 5, lines 19-20)

### **Claim 4**

*Apparatus according to any preceding Claim,*

Apparatus which has all of the features of claim 1 or claim 2 or claim 3 (when dependent on claim 1 or claim 2) plus those that follow (comprising = includes but not limited to, as set out for claim 1)

*wherein the filter material is a mesh,*

the filter material is made from a network of threads or wires which define open passages of a regular size **because this is the normal meaning of this term**

*typically fabricated from steel or other metal material having a mesh hole size of from 1 to 10 mm.*

typically means that the features which follow are optional, and not limiting **because this is patent drafting convention**; it is unclear whether this applies to the material only, or also to the hole size  
steel or other metal material = a metal or metal alloy (steel is just one example)

mesh hole size = the gaps between the threads or wires is within the range of 1 to 10mm **because this is the plain meaning**

	<b>Claim 1</b>	<b>Construction</b>	<b>Infringement Cleanio (Doc B)</b>	<b>Infringement Cleanipro (Doc B)</b>
1.1	Apparatus for cleaning water, the apparatus comprising,	equipment suitable for cleaning water	Yes: page 9, lines 9-10	Yes: Cleanipro incorporates Cleanio (page 10, lines 18-25)
1.2	a holding tank  with a central aperture	a vessel in which water is retained for a period of time  a hole which is located approximately in the centre	Yes: the region defined by the circular wall 2 and the lowermost flexible surface 3 forms a vessel; water is held on the impermeable lowermost flexible surface 3 for a period of time until sufficient water builds up to overflow. page 9, lines 12-13 & 27; page 10, lines 5-6  Yes: the lower flexible surface has a central pipe 5 which extends through the surface (so there must be an aperture). Page 9, lines 13-14	Yes: as for Cleanio; see page 10, line 23  Yes: as for Cleanio (page 9, lines 13-14)
1.3	through which extends an upstanding pipe,	generally vertical tube which runs from below, through the aperture, above it	Yes: The pipe 5 extends through the surface 3 (page 9, line 14); Figures A and B show that the lower end of the pipe is below the aperture and the top end is above it. The pipe is shown as vertical.	Yes: as for Cleanio (page 9, line 14)
1.4	the uppermost edge of which providing a weir	top end of the tube acts as a low dam which regulates the level and flow of water	Yes: the water builds up until it overflows the top end of the pipe page 10, lines 5-7.	Yes: as for Cleanio (page 10, lines 5-7)
1.5	the holding tank having a filter material provided across its top	something which can remove entrained detritus at approximately the upper end of the holding tank	Yes: the upper flexible surface is made from a plastic mesh material (page 9, line 26), which acts as a filter for incoming water (page 10, lines 3-4). It is located close to the top of the circular wall 2 (Fig A)	Yes: uppermost surface 4 made using steel mesh (page 10, line 24)
			<b>All features present, therefore infringed</b>	<b>All features present, therefore infringed</b>

	<b>Claim 2</b>	<b>Construction</b>	<b>Infringement Cleanio (Doc B)</b>	<b>Infringement Cleanipro (Doc B)</b>
2.1	Water cleaning and storage apparatus, the apparatus comprising	equipment suitable for cleaning water and holding the cleaned water until it is used	No: Cleanio is suitable for cleaning water but not for storing water. However it is intended for use with a butt for storing water (page 2, lines 14-15).	Yes: Cleanipro cleans and holds water in an integral lower tank (page 10, lines 19-20)
2.2	a water storage tank  having a top wall  through which a pipe extends	a vessel for holding the cleaned water until it is used  top wall = upper surface of the storage tank  the tube runs from below the top wall, though and above it	No: As above (however, a butt would be present when in use)  No: Cleanio lowermost surface 3 is not part of storage tank  No: Cleanio has pipe 5 through lowermost surface 3 but this is not part of storage tank	Yes: integral lower tank for storage of cleaned water (page 10, lines 19-20)  Yes: lowermost surface 3 is the upper surface of the storage tank  Yes: pipe 5 through lowermost surface 3 (page 9, line 14)
2.3	one end of the pipe providing a weir	the part of the pipe above the top wall regulates the level and flow of water	Yes: the water builds up until it overflows the top end of the pipe page 10, lines 5-7.	Yes: the water builds up until it overflows the top end of the pipe page 10, lines 5-7.
2.4	a peripheral wall upstands from the storage tank to provide a holding tank	outermost wall extends above the top wall of the storage tank so that together they form a vessel for temporarily retaining water	No: Circular wall 2 is peripheral and provides holding tank, but does not upstand from a storage tank (because there is no storage tank)	Yes: wall 2 extends above integral storage tank to provide holding tank (page 10, lines 18-19)
2.5	and wherein a filter material is secured over and between the peripheral wall	Filter material = something which removes entrained detritus, attached to the peripheral wall and located above its upper edge and extending across the top of the holding tank	No: filter material is present but is not located above the upper edge of the water butt (when in use)	No: filter is uppermost surface 4 (appears to be the same location as in Cleanio); this extends internally from the wall 2, but is not located above the upper edge of the wall 2.
			<b>2.1, 2.2, 2.4 and 2.5 not present, therefore not directly infringed. 2.1, 2.2 and 2.4 would be present when Cleanio is installed on a water butt. However, 2.5 is not present, therefore there is no indirect infringement either.</b>	<b>2.5 is not present, therefore not infringed</b>  NB could now consider equivalents for 2.5, but was not part of the law at the time of this paper

	<b>Claim 3</b>	<b>Construction</b>	<b>Infringement Cleanio (Doc B)</b>	<b>Infringement Cleanipro (Doc B)</b>
3.1	Apparatus according to Claim 1 or 2, comprising	Apparatus which has all of the features of claim 1 or claim 1 + 2 plus those that follow	Yes when dependent on claim 1  No when dependent on claim 2	Yes when dependent on claim 1  No when dependent on claim 2
3.2	[when dependent on claim 1]  a wall sloping from or to the pipe	the bottom surface of the holding tank is inclined to the horizontal, either towards or away from the pipe	Yes: lowermost surface slopes towards pipe (see Fig A and page 9, line 13)	Yes: lowermost surface slopes towards pipe (see Fig A and page 9, line 13)
3.3	[when dependent on claim 2]  a wall sloping from or to the pipe	the top wall of the storage tank is inclined to the horizontal either towards or away from the pipe	Yes: lowermost surface slopes towards pipe (see Fig A and page 9, line 13)	Yes: lowermost surface slopes towards pipe (see Fig A and page 9, line 13)
			<b>Additional features of claim 3 are present, therefore infringed when dependent on claim 1 but not infringed when dependent on claim 2</b>	<b>Additional features of claim 3 are present, therefore infringed when dependent on claim 1 but not infringed when dependent on claim 2</b>

	<b>Claim 4</b>	<b>Construction</b>	<b>Infringement Cleanio (Doc B)</b>	<b>Infringement Cleanipro (Doc B)</b>
4.1	Apparatus according to any preceding Claim	Apparatus which has all of the features of claim 1 or claim 2 or claim 3 (when dependent on claim 1 or claim 2) plus those that follow	Yes when dependent on claim 1 or claim 3 +1.  No when dependent on claim 2 or 3 + 2	Yes when dependent on claim 1 or claim 3 +1.  No when dependent on claim 2 or 3 + 2
4.2	wherein the filter material is a mesh,	the filter material is made from a network of threads or wires which define open passages of a regular size	Yes: the uppermost surface 4 is a plastic mesh material (page 9, line 26),	Yes: uppermost surface 4 is a flexible steel mesh (page 10, line 24)
4.3	typically  fabricated from steel or other metal material  having a mesh hole size of from 1 to 10 mm.	“typically” means that the features which follow are optional, and not limiting; it is unclear whether this applies to the material only, or also to the hole size  steel or other metal material = a metal or metal alloy (steel is just one example)  mesh hole size = the gaps between the threads or wires is within the range of 1 to 10mm	Non-limiting feature, therefore not required to be present for infringement.  No: mesh is made of plastic, not metal (page 9, line 26)  Mesh size is not stated; however the claimed range is quite broad and likely to be present since it is intended to retain the same sized objects (leaves etc, page 10, lines 13-14).	Non-limiting feature, therefore not required to be present for infringement.  Yes: uppermost surface 4 is a flexible steel mesh (page 10, line 24)  No: pore size is less than 1mm (page 10, line 25)
			<b>The non-optional additional feature of claim 4 is present, therefore infringed / not infringed according to dependency.</b>	<b>The non-optional additional feature of claim 4 is present, therefore infringed / not infringed according to dependency.</b>



Doc C published 1<sup>st</sup> December 2007, i.e. prior to 1<sup>st</sup> September 2010, so full prior art for both Novelty and Inv. Step.

	<b>Claim 1</b>	<b>Construction</b>	<b>Novelty Figure 1 embodiment (Doc C)</b>	<b>Novelty Figure 2 embodiment (Doc C)</b>
1.1	Apparatus for cleaning water, the apparatus comprising,	equipment suitable for cleaning water	Yes: Page 13, line 7	Yes: Page 15, lines 1-3
1.2	a holding tank  with a central aperture	a vessel in which water is retained for a period of time  a hole which is located approximately in the centre	Yes: upper portion UP of tubular tank 10 has circular baffles 19a, 19b which arrest the flow of water (page 13, lines 13-16); also fine filter causes water to back up into UP (page 14, lines 16-18), hence water is retained for a period of time  Yes: the funnel portion 15 has a tube portion 18 at its centre through which water can flow. Page 13, lines 12-13 & 15	Yes: upper portion UP' of tubular tank 10' has baffles 19a', 19b' which arrest the flow of water in same way as Fig 1 embodiment, so water is retained for a period of time  Yes: the tube portion 18' is approximately central as shown in Fig 2; water flows through it in same way as Fig 1
1.3	through which extends an upstanding pipe,	generally vertical tube which runs from below, through the aperture, above it	Yes: tube portion extends from below, through the conical portion and extends above it (Fig 1; page 13, lines 16-17). The tube portion is shown as vertical (Fig 1).	Yes: tube portion 18' extends vertically from below, through the conical portion and extends above it (Fig 2).
1.4	the uppermost edge of which providing a weir	top end of the tube acts as a low dam which regulates the level and flow of water	Yes: baffle 19b which is formed as an extension of the tube arrests flow of water; page 13, lines 14-15	Yes: baffle 19b' which is formed as an extension of the tube 18' arrests flow of water in same way as Fig 1
1.5	the holding tank having a filter material provided across its top	something which can remove entrained detritus at approximately the upper end of the holding tank	No: the Filter 16 is not located at the top / entry to the holding tank (it is located in the tube, i.e. the exit of the holding tank)	Yes: Filter CF is located across the upper part of UP'
			<b>Not all features disclosed, therefore novel</b>	<b>All features disclosed, therefore not novel</b>

	<b>Claim 2</b>	<b>Construction</b>	<b>Novelty Figure 1 embodiment (Doc C)</b>	<b>Novelty Figure 2 embodiment (Doc C)</b>
2.1	Water cleaning and storage apparatus, the apparatus comprising	equipment suitable for cleaning water and holding the cleaned water until it is used	Yes: Page 13, line 7	Yes: Page 15, lines 1-3
2.2	a water storage tank  having a top wall through which a pipe extends	a vessel for holding the cleaned water until it is used  a tube runs from below the upper surface of the storage tank, though and above it	Yes: lower portion LP of tubular tank 10 stores cleaned water  Yes: the funnel portion 15 has a tube portion 18 which extends from below, through the funnel portion and above it (Fig 1; page 13, lines 12-13).	Yes: lower portion LP' of tubular tank 10' stores cleaned water  Yes: conical wall 17' has tube portion 18' (Fig 2)
2.3	one end of the pipe providing a weir	the part of the pipe above the top wall regulates the level and flow of water	Yes: baffle 19b which is formed as an extension of the tube arrests flow of water (page 13, lines 14-15)	Yes: baffle 19b' which is formed as an extension of the tube 18' arrests flow of water in same way as Fig 1
2.4	a peripheral wall upstands from the storage tank to provide a holding tank	outermost wall extends above the top wall of the storage tank so that together they form a vessel for temporarily retaining water	Yes: tubular tank 10 extends above lower portion LP to form upper portion UP in which water is retained by baffles 19a, 19b (page 13, lines 13-16)	Yes: tubular tank 10' extends above LP' to form UP' in which water is retained by baffles 19a', 19b' in same way as Fig 1
2.5	and wherein a filter material is secured over and between the peripheral wall	Filter material = something which removes entrained detritus attached to the peripheral wall and located above its upper edge and extending across the top of the holding tank	No: the Filter 16 is not attached to the wall of the tank 10, is not located above its upper edge and does not extend across the top of UP	No: Filter CF is not located above the upper edge of UP'
			<b>Not all features disclosed, therefore novel</b>	<b>Not all features disclosed, therefore novel</b>

	<b>Claim 3</b>	<b>Construction</b>	<b>Novelty Figure 1 embodiment (Doc C)</b>	<b>Novelty Figure 2 embodiment (Doc C)</b>
3.1	Apparatus according to Claim 1 or 2, comprising	Apparatus which has all of the features of claim 1 or claim 1 + 2 plus those that follow	No when dependent on claim 1  No when dependent on claim 2	Yes when dependent on claim 1  No when dependent on claim 2
3.2	[when dependent on claim 1]  a wall sloping from or to the pipe	the bottom surface of the holding tank is inclined to the horizontal, either towards or away from the pipe	Yes: conical wall 17 slopes towards the tube 18 (Fig 1)	Yes: 17' slopes towards the tube 18' (Fig 2)
3.3	[when dependent on claim 2]  a wall sloping from or to the pipe	the top wall of the storage tank is inclined to the horizontal either towards or away from the pipe	Yes: conical wall 17 slopes towards the tube 18 (Fig 1)	Yes: 17' slopes towards the tube 18' (Fig 2)
			<b>Additional features of claim 3 are present, but claim 3 is novel by virtue of its dependency on claim 1 / claim 2.</b>	<b>Additional features of claim 3 are present. Claim 3 is not novel when dependent on claim 1, but is novel by virtue of its dependency when dependent on claim 2.</b>

	<b>Claim 4</b>	<b>Construction</b>	<b>Novelty Figure 1 embodiment (Doc C)</b>	<b>Novelty Figure 2 embodiment (Doc C)</b>
4.1	Apparatus according to any preceding Claim	Apparatus which has all of the features of claim 1 or claim 2 or claim 3 (when dependent on claim 1 or claim 2) plus those that follow	No when dependent on claim 1, claim 2, claim 3+1 or claim 3 + 2	Yes when dependent on claim 1 or claim 3+1  No when dependent on claim 2 or claim 3 + 2
4.2	wherein the filter material is a mesh,	the filter material is made from a network of threads or wires which define open passages of a regular size	No: filter 16 is not a mesh (page 13, lines 20-23)	No: not stated whether CF is a mesh or not since it is only stated to comprise a metal frame (page 15, line 11).
4.3	typically  fabricated from steel or other metal material  having a mesh hole size of from 1 to 10 mm.	“typically” means that the features which follow are optional, and not limiting; it is unclear whether this applies to the material only, or also to the hole size  steel or other metal material = a metal or metal alloy (steel is just one example)  mesh hole size = the gaps between the threads or wires is within the range of 1 to 10mm	Non-limiting feature, therefore not required to be present for infringement.  No: no mention of metal (plastic is preferred page 13, lines 22-23)  No: since no mesh	Non-limiting feature, therefore not required to be present for infringement.  Yes: metal frame (page 15, line 11)  No: no mention of hole size
			<b>The non-optional additional feature of claim 4 is not present so claim 4 is novel; claim 4 is also novel by virtue of its dependency.</b>	<b>The non-optional additional feature of claim 4 is not present, so claim 4 is novel (for all dependencies).</b>

## **Inventive step**

Apply the Pozzoli/Windsurfer approach:

The skilled person for claims 1-4 is a manufacturer/designer of water cleaning systems principally for rainwater harvesting.

The common general knowledge is the introductory paragraph of Document B (page 9, lines 3 to 7) and the background section of Document C (page 12, lines 9 -18) and also page 15, line 10 in relation to coarse filters.

### Claim 1

The inventive concept is the combination of a weir (to allow fine particles to settle and a filter to remove coarse particles.

Starting from doc C, Fig 1 embodiment, the difference is the use of a coarse filter at top of holding tank for removing large particles.

This is known in doc C itself from the Fig 2 embodiment. Page 16, line 10 states that coarse filters are well known in the art.

Since the difference does not require any degree of invention and would have been obvious to the skilled person, claim 1 lacks inventive step over doc C in combination with the CGK (as stated in Doc C).

As set out above, I consider that claim 1 lacks novelty over the Figure 2 embodiment of doc C. However, if it were considered that the aperture in the holding tank is not central, this difference would also be obvious, since the position of the aperture has no technical significance, and is a routine variant for the skilled person, which would not be inventive.

### Claim 2

The inventive concept is the particular location of the filter which allows the filter to support the weight of a person walking on it to clean it (page 6, line 17).

Starting from doc C, Fig 2 embodiment, the difference is that the filter is secured over the top of the upper edge of the holding tank.

This is feature is not taught anywhere in the CGK or document C, so claim 2 is inventive.

### Claim 3

The additional features of claim 3 are disclosed in both embodiments of Doc C. Therefore claim 3 is not independently inventive. It is inventive when dependent on claim 2 by virtue of dependency, but not when dependent on claim 1.

### Claim 4

The inventive concept of the only essential feature of claim 4 is to use a mesh as the coarse filter. It is CGK to use a coarse filter to remove large particles (doc C, page 15, line 17). A mesh seems to be a well-known type of coarse filter.

The non-essential features (metal mesh, pore size of 1 – 10 mm) are also likely to be CGK.

Therefore claim 4 lacks inventive step.

### **Summary of infringement and validity**

Claim 1 is infringed by both Cleanio and CleaniPro, and is novel, but is invalid for lack of inventive step.

Claim 2 is not infringed by Cleanio or CleaniPro. It is novel and inventive.

Claim 3 is infringed by both Cleanio and CleaniPro when dependent on claim 1, but not when dependent on claim 2. Claim 3 lacks inventive step when dependent on claim 1, but is valid when dependent on claim 2.

Claim 4 is infringed by both Cleanio and CleaniPro when dependent on claim 1 or 3+1, but not when dependent on claim 2 or 3+2. Claim 3 lacks inventive step when dependent on claim 1, but is valid when dependent on claim 2.

**Amendment**

Claim 1 could be amended to specify that the pipe / weir is slidably movable, based on page 5, lines 26-28. The amended claim would be infringed by both Cleanio (page 9, lines 17-23, page 10, lines 9 – 15 and Figs A & B) and CleaniPro, (10, line 20-22). The amended claim would be inventive because there is no suggestion in Doc C or the CGK to have a movable pipe / weir.

An alternative amendment would be to specify that the filter is cleaned by sweeping arms, based on page 6, line 20. This is less preferable because it would be infringed by CleaniPro (page 10, lines 25-27) but not by Cleanio. The amended claim would be inventive because there is no suggestion in Doc C or the CGK to have a sweeping arms.

**Sufficiency**

There are no sufficiency issues.



**Advice**

The Patent is in force and so the client could commence litigation (after sending a letter before action) straight away. The client must move fast if seeking an interim injunction, especially in light of CleaniPro.

Wasteaway are importing Cleanio – and will import CleaniPro. Wasteaway is an importer, so the client's discussion is not an actionable threat. A prima facie case for infringement exists.

The client is more established in the market especially with respect to commercial articles (despite disappointing sales). Wasteaway Cleanio product appears to be potentially commercially more successful than the patented product – think about licensing Cleanio.